

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

HILARY REMIJAS, MELISSA FRANK,
DEBBIE FARNOUSH, and JOANNE KAO,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a
Delaware limited liability company,

Defendant.

Case No. 1:14-cv-01735

Hon. Samuel Der-Yeghiayan

**AGREED MOTION SEEKING PERMISSION TO EXCEED PAGE LIMITATION ON
PLAINTIFFS' REPLY IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVE
SERVICE AWARDS**

Plaintiffs Hilary Remijas, Melissa Frank, Debbie Farnoush, and Joanne Kao ("Plaintiffs"), by and through their attorneys, respectfully move for an extension of the fifteen-page limit applicable to their Reply in Support of Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards. In support of this motion, Plaintiffs state as follows:

1. Two different objections to this Class Action Settlement have been filed, each over 15 pages. Plaintiffs respectfully submit that in order to address both objections and properly explain to the Court the details of their response, twenty-five (25) pages are required. Plaintiffs

intend to file one reply brief addressing all points raised in the objections. Plaintiffs have made their best effort to keep the reply brief in support of Final Approval at a reasonable length given the breadth of material it covers, but Plaintiffs believe that in a Memorandum of this complexity and consequence to the proposed class, exceeding the fifteen-page limitation will benefit the Court's consideration of the substantial rights and remedies that Plaintiffs' Motion seeks on behalf of the proposed class. Plaintiffs submit that in these circumstances, it is fair and consistent with the interests of justice to allow for a brief of this length in support of their Reply in Support of Final Approval. There is no prejudice to Defendant Neiman Marcus, and Daniel Craig, counsel for Defendant, represented to Robert Ahdoot, counsel for Plaintiffs, that Defendant does not oppose this motion.

2. In light of the foregoing, Plaintiffs respectfully request that they be granted leave to file a twenty-five-page Memorandum in support of their Reply in Support of Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards.

WHEREFOR, Plaintiffs respectfully request that this Court enter an order permitting them to file a twenty-five-page Memorandum in support of their Reply in Support of Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards.

Dated: October 19, 2017

Respectfully submitted,

/s/ Tina Wolfson

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that the foregoing Agreed Motion Seeking Permission to Exceed Page Limitation in Memorandum Reply in Support of Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards was filed electronically with the Clerk of the Court using the CM/ECF system on this 19th day of October, 2017, and served electronically on all counsel of record.

/s/ Tina Wolfson
Tina Wolfson